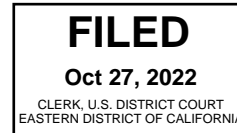


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United States of America



8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 CHALONER SAINTILLUS,
15 Defendant.

CASE NO. 2:20-CR-00213-KJM

21 U.S.C. § 841(a)(1) – Distribution of Controlled
Substances (12 counts); 21 U.S.C. § 853(a) –
Criminal Forfeiture

17 S U P E R S E D I N G I N D I C T M E N T

18 COUNT ONE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

19 The Grand Jury charges: T H A T

20 CHALONER SAINTILLUS,

21 defendant herein, on or about April 16, 2020, in the County of Sacramento, State and Eastern District of
22 California, and elsewhere, did knowingly and intentionally distribute oxymorphone, a Schedule II
23 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

24 COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

25 The Grand Jury further charges: T H A T

26 CHALONER SAINTILLUS,

27 defendant herein, on or about April 22, 2020, in the County of Sacramento, State and Eastern District of
28 California, and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled

1 substance, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (popularly known as
2 “fentanyl”), a Schedule II controlled substance, in a package assigned United States Postal Service
3 tracking number 9505 5065 8086 0113 2077 48, in violation of Title 21, United States Code, Section
4 841(a)(1).

5 COUNT THREE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

6 The Grand Jury further charges: T H A T

7 CHALONER SAINTILLUS,

8 defendant herein, on or about April 22, 2020, in the County of Sacramento, State and Eastern District of
9 California, and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled
10 substance, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (popularly known as
11 “fentanyl”), a Schedule II controlled substance, in a package assigned United States Postal Service
12 tracking number 9505 5065 8086 0113 2077 62, in violation of Title 21, United States Code, Section
13 841(a)(1).

14 COUNT FOUR: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

15 The Grand Jury further charges: T H A T

16 CHALONER SAINTILLUS,

17 defendant herein, on or about April 29, 2020, in the County of Sacramento, State and Eastern District of
18 California, and elsewhere, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl)-4-
19 piperidiny] propanamide (popularly known as “fentanyl”), a Schedule II controlled substance, in
20 violation of Title 21, United States Code, Section 841(a)(1).

21 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

22 The Grand Jury further charges: T H A T

23 CHALONER SAINTILLUS,

24 defendant herein, on or about May 20, 2020, in the County of Sacramento, State and Eastern District of
25 California, and elsewhere, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl)-4-
26 piperidiny] propanamide (popularly known as “fentanyl”), a Schedule II controlled substance, in
27 violation of Title 21, United States Code, Section 841(a)(1).

1 COUNT SIX: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

2 The Grand Jury further charges: T H A T

3 CHALONER SAINTILLUS,

4 defendant herein, on or about June 1, 2020, in the County of Sacramento, State and Eastern District of
5 California, and elsewhere, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl)-4-
6 piperidinyl] propanamide (popularly known as “fentanyl”), a Schedule II controlled substance, in
7 violation of Title 21, United States Code, Section 841(a)(1).

8 COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

9 The Grand Jury further charges: T H A T

10 CHALONER SAINTILLUS,

11 defendant herein, on or about June 13, 2020, in the County of Sacramento, State and Eastern District of
12 California, and elsewhere, did knowingly and intentionally distribute oxycodone, a Schedule II
13 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

14 COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

15 The Grand Jury further charges: T H A T

16 CHALONER SAINTILLUS,

17 defendant herein, on or about July 6, 2020, in the County of Sacramento, State and Eastern District of
18 California, and elsewhere, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl)-4-
19 piperidinyl] propanamide (popularly known as “fentanyl”), a Schedule II controlled substance, in
20 violation of Title 21, United States Code, Section 841(a)(1).

21 COUNT NINE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

22 The Grand Jury further charges: T H A T

23 CHALONER SAINTILLUS,

24 defendant herein, on or about July 7, 2020, in the County of Sacramento, State and Eastern District of
25 California, and elsewhere, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl)-4-
26 piperidinyl] propanamide (popularly known as “fentanyl”), a Schedule II controlled substance, in
27 violation of Title 21, United States Code, Section 841(a)(1).

28 COUNT TEN: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

1 The Grand Jury further charges: T H A T

2 CHALONER SAINTILLUS,

3 defendant herein, on or about August 20, 2020, in the County of Sacramento, State and Eastern District
4 of California, and elsewhere, did knowingly and intentionally distribute oxymorphone, a Schedule II
5 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6 COUNT ELEVEN: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

7 The Grand Jury further charges: T H A T

8 CHALONER SAINTILLUS,

9 defendant herein, on or about October 21, 2020, in the County of Sacramento, State and Eastern District
10 of California, and elsewhere, did knowingly and intentionally distribute oxycodone, a Schedule II
11 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

12 COUNT TWELVE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

13 The Grand Jury further charges: T H A T

14 CHALONER SAINTILLUS,

15 defendant herein, on or about October 26, 2020, in the County of Sacramento, State and Eastern District
16 of California, and elsewhere, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl)-
17 4-piperidinyl] propanamide (popularly known as “fentanyl”), a Schedule II controlled substance, in
18 violation of Title 21, United States Code, Section 841(a)(1).

19 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) – Criminal Forfeiture]

20 1. Upon conviction of one or more of the offenses alleged in Counts One through Twelve of
21 this Superseding Indictment, defendant CHALONER SAINTILLUS shall forfeit to the United States
22 pursuant to Title 21, United States Code, Section 853(a), the following property:

23 a. All right, title, and interest in any and all property involved in violations of Title
24 21, United States Code, Section 841(a)(1), for which defendantis convicted, and all property traceable to
25 such property, including the following: all real or personal property, which constitutes or is derived from
26 proceeds obtained, directly or indirectly, as a result of such offenses; and all property used, or intended
27 to be used, in any manner or part to commit or to facilitate the commission of the offenses.

28 b. A sum of money equal to the total amount of proceeds obtained as a result of the

1 offenses, for which defendant is convicted.

2 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
3 through Twelve of this Superseding Indictment, for which defendant is convicted:


- 4 a. cannot be located upon the exercise of due diligence;
5 b. has been transferred or sold to, or deposited with, a third party;
6 c. has been placed beyond the jurisdiction of the Court;
7 d. has been substantially diminished in value; or
8 e. has been commingled with other property which cannot be divided without
9 difficulty;

10 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek
11 forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

12
13 A TRUE BILL.

14 **/s/ Signature on file w/AUSA**

15
16 FOREPERSON

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18 PHILLIP A. TALBERT
19 United States Attorney
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No. 2:20-CR-00213-KJM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

NO PROCESS NECESSARY
CHALONER SAINTILLUS

SUPERSEDING INDICTMENT

VIOLATION(S):

21 U.S.C. § 841(a)(1) – Distribution of Controlled Substances (12 counts);
21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 27th day

of October, A.D. 20 22

/s/ L. Kennison

Clerk.

NO PROCESS NECESSARY

Carol H. Delaney

United States v. Chaloner Saintillus
Penalties for Superseding Indictment

ALL COUNTS

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Controlled Substances

PENALTIES: Imprisonment of up to twenty (20) years; or
Fine of up to \$1,000,000; or both fine and imprisonment;
Supervised release of at least three (3) years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

FORFEITURE ALLEGATION

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document